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**Presentment Date: August 7, 2020 12:00 PM**  
**Objection Date: July 31, 2020**

*Attorneys for Defendant Joan Roman*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC,

Adv. Pro. No. 10-04302 (SMB)

Plaintiff,

v.

JOAN ROMAN,

Defendant.

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT  
OF APPLICATION TO WITHDRAW AS COUNSEL**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C.

§1746, as follows:

1. I am a partner with Chaitman LLP, counsel of record to Defendant, Joan Roman, (the “Defendant”). I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Chaitman LLP to withdraw as counsel to the Defendant; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the foregoing is based on my personal knowledge.

2. The Trustee commenced this adversary proceeding against the Defendant on November 26, 2010 (the “Adversary Proceeding”).

3. Thereafter, Defendant retained Becker & Poliakoff LLP to represent her.

4. On behalf of Defendant, while at Becker & Poliakoff, LLP, I filed a Notice of Appearance on January 28, 2011 (ECF Doc. No. 3).

5. On behalf of the Defendant as a partner of Chaitman LLP, I filed a Notice of Appearance and Request for Service of Papers on October 12, 2015 (ECF Doc. No. 54).

6. Differences have arisen which make it impossible for me to continue to represent the Defendant.

7. The Adversary Proceeding will not be disrupted or unduly delayed as a result of this firm’s withdrawal as Defendant’s counsel.

8. Accordingly, cause exists to grant the application authorizing Chaitman LLP to withdraw as counsel for the Defendant.

Dated: July 17, 2020  
New York, New York

/s/ Helen Davis Chaitman